



Pillsbury  
Winthrop  
Shaw  
Pittman<sup>LLP</sup>

2300 N Street, N.W.  
Washington, D.C. 20037-1128

Tel 202.663.8000  
Fax 202.663.8007  
[www.pillsburylaw.com](http://www.pillsburylaw.com)

March 16, 2006

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

Re: **EB-06-TC-060**  
**EB Docket No. 06-36**

Dear Ms. Dortch:

Enclosed please find Eureka Telecom, Inc.'s Compliance Certificate, as required by 47 C.F.R. §64.2009(e), for the period January 1, 2005-December 31, 2005, along with the company's accompanying statement explaining how its operating procedures ensure compliance with the rules.

Sincerely,

\_\_\_\_\_  
/s/

Glenn S. Richards  
Pillsbury Winthrop Shaw Pittman LLP

Attachment

CC: Byron McCoy, Enforcement Bureau (via e-mail)  
Best Copy and Printing (via e-mail)

## Eureka Telecom, Inc.'s Compliance Certification

For the Period January 1, 2005-December 31, 2005

I certify as an officer of Eureka Telecom, Inc., that I have personal knowledge that Eureka Telecom, Inc. has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission requirements as it pertains to Customer Proprietary Network Information, pursuant to Section 222 of the Communications Act and 47 C.F.R. §64.2001-2009.

PRINTED NAME	<u>Adam Lewis</u>
POSITION	<u>Secretary</u>
SIGNATURE	<u></u>
DATE	<u>12/31/05</u>

## **Eureka Telecom, Inc.'s Compliance Statement Regarding CPNI**

**For the Period January 1, 2005-December 31, 2005**

### **Compliance with 47 C.F.R § 64.2001-2009**

#### **Notice and Approval.**

Eureka Telecom, Inc. ("Eureka") is in compliance with rules requiring notice and approval to use customer proprietary network information (CPNI). Eureka requires new customers to sign a CPNI use authorization. This authorization is kept on file in Eureka's offices in both paper and electronic form. In its marketing campaigns, Eureka does not use the CPNI of customers who withheld approval.

#### **Protecting Confidentiality.**

Eureka maintains the security of CPNI. The company has security measures in place to protect this data from:

- external attacks to its network,
- improper use of web portals provided to customers,
- improper use of FTP (file transfer protocol) sites where customers can obtain data, and
- improper verbal requests for data via personal contacts with Eureka's Customer Care.

All of Eureka's network equipment is located in facilities where the company or its contractor maintains the physical security of the building. At a network level, Eureka employs several firewalls and secure ID technology to protect the infrastructure and management of its network. There is limited employee access to the company's network equipment.

Eureka's web portal allows customers to view traffic data. The web portal has login/password security and uses encryption to ensure the security of this information. The web portal limits customers to access their specific data only. The company has procedures in place that allow only customers of record to obtain specific call detail information. The company's employees have been trained in the proper use of CPNI, and the company will enforce strict disciplinary measures for employees that misuse or mishandle CPNI. Eureka does not provide CPNI to non-affiliated third parties and does not sell CPNI.